

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

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CLERK OF COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHAIMONE BARKHADLE,

Defendant.

Case No. **20-CR-043**
[18 U.S.C. §§ 2, 1343 and 1028A]

INFORMATION

COUNT ONE
(18 U.S.C. § 1343)

THE UNITED STATES ATTORNEY CHARGES:

1. Beginning in approximately December 2017 and continuing until at least May 2018, in the state and Eastern District of Wisconsin, and elsewhere,

SHAIMONE BARKHADLE,

with intent to defraud, devised and participated in a scheme to defraud and to obtain money by means of material false and fraudulent pretenses and representations (the "scheme"), which scheme is described more fully below.

2. For purposes of executing this scheme, Barkhadle, and others participating with him in the scheme, used and caused the use of the interstate wire communications, including the electronic transfer of funds between fraudulent bank accounts opened and maintained as part of the scheme.

3. At all times relevant to this indictment, Barkhadle resided in Milwaukee, Wisconsin.

4. The scheme was essentially as follows:

a. Barkhadle, and other participants in the scheme, fraudulently opened bank accounts in Wisconsin, Illinois, and elsewhere using stolen and fictitious identities.

b. In particular, using the name, date of birth, and Social Security number of an individual with the initials R.R., Barkhadle and other participants in the scheme opened accounts at three banks, which are referred herein simply as Bank A, Bank B, and Bank C.

c. Barkhadle, and other participants in the scheme, also fraudulently opened bank accounts in the names of various fictitious businesses, including Riverfront Construction, LLC, at Bank A.

d. Barkhadle and other participants in the scheme transferred funds between the various fraudulent bank accounts they had opened.


e. Participants in the scheme sent fraudulent e-mails to businesses throughout the United States that falsely appeared to be from third parties who were vendors or customers of the businesses. The fraudulent e-mails directed the recipient businesses to submit payments owed to the third parties to a new bank account purportedly belonging to the third party. In fact, the bank account was an account Barkhadle, and other participants in the scheme, had opened in the name of Riverfront Construction at Bank A.

f. As a result of these fraudulent e-mails, victim businesses transferred more than \$1.2 million to the Riverfront Construction account at Bank A.

g. Using the identity of R.R., Barkhadle applied for and obtained a loan in the amount of \$15,000 from Bank B.

h. Barkhadle later transferred loan proceeds from Bank B to other fraudulent accounts he, and other participants in the scheme, had opened at Bank A, Bank B, and Bank C in the name of R.R. and Riverfront Construction.

5. Barkhadle and other participants in the scheme withdrew funds from the fraudulent



accounts they had opened at Bank A, Bank B, and Bank C using automated teller machines (ATMs) located in Chicago, Illinois, Milwaukee, Wisconsin, and elsewhere.

6. As a result of this scheme, Barkhadle fraudulently obtained and attempted to obtain more than \$75,000.

7. On or about March 12, 2018, in the state and Eastern District of Wisconsin, and elsewhere,

SHAIMONE BARKHADLE

for purposes of executing the scheme to defraud and to obtain money by means of material false and fraudulent pretenses and representations described above, knowingly, and with intent to defraud, used and the caused the use of interstate wire communications, by electronically transferring \$2,000 from the account Barkhadle opened in the name of R.R. at Bank B to an account Barkhadle opened in the name of R.R. at Bank A.

All in violation of Title 18, United States Code, Sections 2 and 1343.

COUNT TWO
(18 U.S.C. § 1028A)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about January 13, 2018, in the state and Eastern District of Wisconsin and elsewhere,

SHAIMONE BARKHADLE

knowingly possessed and used, without lawful authority, a means of identification of another person, specifically the name, date of birth, and Social Security number of another person, during and in relation to the felony offense of wire fraud, in violation of 18 U.S.C. § 1343, as charged above in Count One of this information, knowing that the means of identification belonged to another actual person. More particularly, Barkhadle fraudulently used R.R.'s name, date of birth, and Social Security number to obtain a loan in the amount of \$15,000 from Bank B.

In violation of Title 18, United States Code, Section 1028A(a)(1).

2-21-2020

Date



MATTHEW D. KRUEGER
United States Attorney